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August 5, 2015

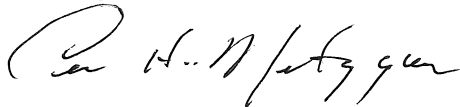
Mr. Ken Blodgett
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423

ATTN: Office of Environmental Analysis
Docket No. 30186

Mr. Blodgett:

Please accept the following written comments that regard the Surface Transportation Board
Draft EIS on the proposed Tongue River Railroad.

With appreciation for your consideration,

A handwritten signature in cursive script, appearing to read "Lee H. Metzgar".

Lee H.. Metzgar

Comments on the
Department of Surface Transportation Tongue River Railroad Draft EIS
Pertaining to Greenhouse Gasses and Climate Change

Submitted 5 August, 2015

By Lee H. Metzgar,
1001 E. Broadway ST., #2-206
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If the coal that would be transported on the TRRR is burned, it will contribute over two billion metric tons of carbon dioxide equivalents to the atmosphere [1]. The inclusive, climate change-related costs of emitting that much CO₂ are estimated by various US agencies at between 11 and 144 billion dollars and perhaps even more [2].

The DEIS assumes that selling Tongue River coal from the Otter Cr. and "induced" mines will displace other fossil fuels and result in little net contribution to global CO₂ emissions. But in fact, 23 years from now, at the end of this project's life span, the Tongue River coal either will or will not have been burned. If burned, it will have done billions or even hundreds of billions of dollars worth of damage. Rather than ignoring those costs, all "Build" alternatives should identify them as such and the "No Action" alternative should identify their prevention as a benefit. Clearly, the greatest potential gains from this project do not rise to the level of the harm it would cause.

In the shorter term, to the extent that Tongue River coal would displace more-costly alternative fossil fuels, keeping that coal in the ground would encourage continued conversion to cleaner power generation from natural gas and renewable energy [3]. Because net gains in Montana jobs and wealth have been shown to accompany the conversion from fossil fuel to renewable energy sources [4], the No Action alternative will result in additional benefits not recognized by the DEIS. These benefits need to be included in the EIS analyses.

There is now a consensus among scientists that approximately 75% of known fossil fuel reserves must remain in the ground if the world is to have a reasonable chance for a healthy climate. It is time to stop the insanity of developing new fossil fuel sources when we know that most of it must remain in the ground. Tongue River coal should be at the top of our list for fossil fuel reserves that should not be developed. It is a dirty fuel that emits exceptionally high amounts of greenhouse gases and it will contribute little to our national interest. The enormous benefits of leaving this coal in the ground overwhelm any economic gain from its extraction, sale and use.

The only way to safely sequester the carbon in fossil fuels is to leave those fuels in the ground. The only clean coal remains un-mined. The Surface Transportation Board will best serve Montana and the nation by selecting the No Action alternative.

FOOTNOTES

1. Tongue River Railroad DEIS, Table 5.2-15.

2. Depending on who does the calculation and their methodology (economic modeling based on projected growth, climate behavior, and related physical damages), estimates for the inclusive costs per metric ton of CO₂ equivalents range from \$5.50 to \$72.

[See: <http://www.epa.gov/oms/climate/regulations/scc-tds.pdf>]

However, a more recent report states that these estimates are too low.

[See: <http://www.motherjones.com/blue-marble/2011/08/carbon-dioxide-emissions-cost-economy-underestimated>]

3. Power consulting, Inc. 2012. Changes in the market for Montana Powder River Basin Coal between 1986 and 2012. A report prepared for the Northern Plains Resource Council.

4. MT Department of Environmental Quality, 2014 White Paper: Options for Montana's Energy Future, Creating jobs and delivering clean air in a changing economy.

<http://governor.mt.gov/Portals/16/docs/111dwhitepaperpathways91914-final.pdf>